



June 8, 2010

Submitted electronically

Stacey Kinsella, Associate Planner
Department of City Planning
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Re: Notice of Preparation – 504 Paseo del Mar Project

Dear Ms. Kinsella:

On behalf of the Los Angeles Conservancy, we submit these comments on the proposed 504 Paseo del Mar Project and the need to consider alternatives that retain the historic Moore House as part of the ongoing environmental review process. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. Since 1984, the Conservancy's all-volunteer Modern Committee has worked to raise awareness about Los Angeles County's unique collection of mid-20th-century modernist structures that shaped the tastes and architectural trends of the entire nation.

The Conservancy and its Modern Committee have long considered the Moore House to be a highly significant architectural treasure. In June 2009, the Conservancy submitted written comments opposing the applicants' initial plans to demolish the house to make way for a new residence. At the time, we were joined by a distinguished coalition of experts, including the California Preservation Foundation, Lloyd Wright scholar Dana Hutt, and architect Eric Lloyd Wright (Lloyd Wright's son), among others. The revised project has elicited an overwhelming public response, with over 150 comment letters submitted to date from area residents, design professionals, architectural historians, and local historic preservation organizations from across the country.

A. Architectural Significance of the Moore House

Located at 504 Paseo del Mar, the Moore House is a notable example of Lloyd Wright's postwar residential designs. Lloyd Wright (1890-1978), son of internationally renowned architect Frank Lloyd Wright, had a successful career focused in Southern California that spanned over six decades. His career produced such well known works as the Wayfarer's Chapel (1951 with later additions) and Bird of Paradise House (1965) in nearby Rancho Palos Verdes. Several of Lloyd Wright's residential designs throughout Los Angeles County are designated local landmarks,

including the Adams Residence and the Headly/Handley House, which are both City of Los Angeles Historic-Cultural Monuments. Other residences throughout Los Angeles County are listed in the National Register of Historic Places, including the Derby House (1926) in Glendale, the Sowden House (1926) in Los Angeles, and the Lloyd Wright Home and Studio (1927) in West Hollywood.

The Moore House, completed in 1959, was designed during a period in which Lloyd Wright's work was known for flared, flamboyant forms. Architectural historian David Gebhard has described Lloyd Wright's postwar residential designs as "agitated, flamboyant and anything but quiet" and "domestic single family equivalents to the sparkling and tinselly world of Wilshire Boulevard."¹ This unique house features dramatically angled roof overhangs, walls clad in locally quarried Palos Verdes stone, and expansive windows to take advantage of ocean views. Wright's innovative arrangement of interior rooms placed the common areas, including the living room, dining room and kitchen, along with the master bedroom on the upper floor for maximum views of the ocean and coastline. The Moore House is profiled in the monograph *Lloyd Wright: The Architecture of Frank Lloyd Wright Jr.* with photography by Alan Weintraub and text by Dana Hutt.

B. The EIR must evaluate at least one alternative that retains the Moore House

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."² CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."³ Courts often refer to the EIR as "the heart" of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁴

As currently proposed, the project would raze the Moore House for construction of a new residential structure containing 5,935 square feet of living space, plus a 700 square foot attached garage. Because the Moore House has been deemed "eligible for listing as a historic resource,"⁵ the EIR must evaluate at least one potentially feasible preservation alternative that attempts to meet most project objectives.

Because the proposed project would be serve the same function as currently provided by the Moore House—a single-family residential structure—an alternative should be included in the EIR that rehabilitates the Moore House for enhanced livability. In addition, an alternative that

¹ Weintraub, Alan and Dana Hutt. *Lloyd Wright: The Architecture of Frank Lloyd Wright Jr.* New York: Abrams, 1998: 35.

² Public Resource Code, Sec. 21001 (b), (c).

³ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41, italics added; also see PRC Secs. 21002, 21002.1.

⁴ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁵ Notice of Preparation of a Draft Environmental Impact Report, 504 Paseo del Mar Project. May 10, 2010. p. 1.

rehabilitates the house and increases its square footage with a sensitively scaled addition should be also included to address the applicants' desire for increased living space.

The rehabilitation only option would allow for upgrades to the Moore House's interior within the structure's exterior building envelope. Flexibility exists for changing the uses of various rooms, or potentially expanding space through their consolidation, particularly on the lower level where several of the smaller bedrooms are located. For the second option, a sensitively scaled addition could provide increased living space while minimizing impacts to the house's historic fabric and viewsheds. Such a low profile addition might be partially subterranean and extend into the area of the west lawn, rising no higher than the terrace level. The designs for such an addition should follow the *Secretary of the Interior's Standards for Rehabilitation*, with new work clearly differentiated from the old yet compatible to protect the integrity of the Moore House.

Thank you for the opportunity to comment on the Notice of Preparation for the 504 Paseo del Mar Project. Please feel free to contact me at (213) 430-4203 or mbuhler@laconservancy.org should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Buhler", with a stylized, cursive script.

Mike Buhler
Director of Advocacy